



Business Network
Long Distance

October 24, 2011

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Dear Chairman Genachowski:

I am writing in response to your Notice of Proposed Rulemaking as the concerned owner and president of an independent long distance network carrier in the U.S. – Business Network Long Distance (BNLD). While we are with you in being opposed to cramming, we strongly believe that third-party billing services provide a great value to the business community and individuals, and that any new rules should put the consumer and small business concerns first.

BNLD is a small business operating in Denver, Colorado that provides essential telecommunication services to hundreds of other small businesses in forty-three states across the country. We offer a broad range of local and long distance services to residential customers and small to mid-sized businesses. And I know first-hand that third-party billing helps my business customers reduce their administrative costs and consolidate back-office billing and telecommunications services through one provider. All of this helps them expand their business and reduce costs for consumers. In addition, I know my residential customers prefer the ease and convenience of being able to pay all their expenses on one bill.

The Notice of Proposed Rulemaking contains measures that we can support and ones that we feel will go a long way towards rooting out the bad actors who commit “cramming.” For example, we feel that requiring “due diligence” to be performed before allowing any vendors to provide service is a good idea that will help protect consumers.

What we do not support and feel would do more harm to businesses and consumers would be an outright ban of third-party billing. This ban would unnecessarily harm small businesses – including our company, and the hundreds of businesses we serve. For businesses like mine, it would increase costs to acquire new customers. This will lead to less market competition, and fewer options for small offices and home offices, as well as for residential customers. We believe it would be far more effective to take additional steps to protect and educate customers, reform the system and root out the bad actors.

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Companies like BNLD who offer telecommunications services provide great value to their customers and go above and beyond to ensure that we are protecting consumers from practices like cramming. As you look to stop unscrupulous crammers, please don't let the pendulum swing too far in the other direction, and cause inadvertent harm to reputable businesses and their thousands of customers.

Sincerely,

A handwritten signature in blue ink, appearing to read "BACS", written over a horizontal line.

Brian Curtiss
Owner & President
Business Network Long Distance